

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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LISA PENNICK, )  
Plaintiff, )  
v. ) 05-cv-11060-WGY  
MICHELLE GRENNON, GRENNON )  
DESIGN )  
Defendants. )  
\_\_\_\_\_  
)

**AFFIDAVIT OF LISA PENNICK IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS AND/OR TRANSFER VENUE**

I, Lisa Pennick, make the following affidavit under oath based on my personal knowledge:

1. I am the plaintiff in this action.
2. In September 2002, Michelle Grennon contacted me at my home and place of business in Marblehead, Massachusetts and inquired about hiring me to perform interior design work for her home in New Castle, New Hampshire.
3. I have never solicited any business in New Hampshire. Prior to working for Ms. Grennon, I had only had one previous client – a family friend – located in New Hampshire.
4. Since working for Ms. Grennon, I have not had any other clients in New Hampshire.
5. I was hired by Ms. Grennon in December 2002. Over the next two years, I worked with a number of sales personnel at showrooms inside the Boston Design Center,

such as Lucy Arsnow Leak at Baker, Knapp & Tubbs; Gretchen Schwilk at Steven King, Inc.; David Webster at Webster & Company; and Michael Gillick. I also worked with a number of sales personnel at other showrooms in Massachusetts, such as Patricia Mullaney at Bygone's of Ireland; Karine Jouenne at Soft Walls Associates; and Bernie Pine at Landry & Acari.

6. After the Project was completed, I took three of my Massachusetts clients to see the Project -- Maureen Palmer, Sandy Newman, and Liz Talbot. During each of the trips to see the Project with those clients, Ms. Grennon complimented my work as the Project's lead interior designer. Ms. Grennon at no time indicated she took issue with my representation that I was the Project's lead interior designer.

7. In or around February 2005, Mr. Pine and Ms. Arsnow Leak called me and informed me that Ms. Grennon had entered the Project's Media Room in Boston's Luxury Living Awards, run by Boston's HomeWorks Sourcebook magazine, and that Ms. Grennon had not listed me as a contributor to the Project.

8. In or around February 2005, while working at the Boston Design Center, Mr. Gillick informed me of the article about the Project in Accent Home & Garden Magazine. I then purchased the magazine at a newsstand in Marblehead, Massachusetts.

9. In or around March 2005, Mr. Pine called me and informed me that he had received an invitation at Landry & Acari, to a reception hosted by Grennon Design at the Project.

10. In or around April 2005, I met with John Kenney and Christina Tassi of Boston's Luxury Living Awards and Boston's HomeWorks Sourcebook magazine regarding the attribution of credit for the Media Room. They informed me that they had

also spoken with Ms. Grennon and that Ms. Grennon had told them I was not the interior designer on the Project.

Signed this 6th day of June, 2005, under the penalties of perjury.

/s/ Lisa Pennick  
Lisa Pennick